

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA

RANDY LUNDY,)	
)	
Plaintiff,)	
)	
v.)	Case No: 5:22-cv-00699-F
)	
HL MOTOR GROUP, INC.,)	
HIGHLIGHT MOTOR FREIGHT USA, INC.,)	
OLD REPUBLIC INSURANCE COMPANY)	
and OGNJEN MILANOVIC,)	
)	
Defendants.)	

AFFIDAVIT OF NYRON JEALALL

I, Nyron Jealall, under penalties as provided by law pursuant to the Federal Rules of Civil Procedure, certify that the statements set forth herein are true and correct and that, if called upon to testify in the above-captioned case, I could competently testify to the following statements based upon my personal knowledge.

1. I am the Claims Manager of HL Motor Group, Inc., a trucking company located in Ontario, Canada.

2. In my position as Claims Manager, I have become familiar with the history, organization and activities of Highlight, a company that is engaged in providing transportation, warehousing and distribution services.

3. In my position as Claims Manager, I am also familiar with its corporate records and documents, which include records of HL Motor Group, Inc.'s affiliations, ownership and leasing of commercial trucking vehicles and trailers, employees and records related to transportation and delivery.

4. Highlight Motor Freight USA, Inc., is a company affiliated with but not a part or a subsidiary of HL Motor Group, Inc.

5. Highlight Motor Freight USA, Inc. is a company that is organized and existing under the laws of State of New Jersey.

6. Highlight Motor Freight USA, Inc.'s principal place of business, offices and distribution center are located in Parsippany, New Jersey.

7. Highlight Motor Freight USA, Inc. is not incorporated nor does it have a principal place of business in the State of Oklahoma.

8. I have reviewed the Complaint in this matter, which generally alleges that plaintiff sustained property damages resulting from an August 8, 2020 motor vehicle collision with a vehicle operated by Ognjen Milanovic ("Mr. Milanovic") who was employed by "HL Motor Group, Inc. and/or Highlight Motor Freight USA, Inc."

9. On August 8, 2020, while engaged in the activity described in the Complaint in this matter, Mr. Milanovic was an employee of HL Motor Group, Inc.

10. On August 8, 2020, while engaged in the activity described in the Complaint in this matter, Mr. Milanovic was not, nor has he ever been an employee of Highlight Motor Freight USA, Inc.



Nyron Jealall